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Investigation by the Department of Telecommunications	)	
and Energy on its own Motion into the Appropriate Pricing,	)	
based upon Total Element Long-Run Incremental Costs,	)	
for Unbundled Network Elements and Combinations of	)	D.T.E. 01-20
Unbundled Network Elements, and the Appropriate	)	
Avoided Cost Discount for Verizon New England, Inc.,	)	
d/b/a Verizon Massachusetts' Resale Services in the	)	
Commonwealth of Massachusetts	)	
	)	

Conversent Communications of Massachusetts, LLC (“Conversent”) hereby requests that Verizon Massachusetts (“Verizon”) provide the data information and documents described below. Please provide your responses to Scott Sawyer, Vice President of Regulatory Affairs, 222 Richmond Street, Suite 301, Providence, Rhode Island 02903, within ten (10) calendar days.

1. “Verizon” or “Verizon-Massachusetts” or “VZ-MA” or “Verizon MA” refers to Verizon New England, Inc. d/b/a Verizon Massachusetts f/k/a Bell Atlantic - Massachusetts, Inc., its subsidiaries, operating companies, affiliates, directors, officers, employees and agents, unless otherwise indicated.

2. “CLEC” refers to any competitive local exchange carrier.
3. The word “similar” is intended to be as comprehensive as possible.
4. “Document” means any written, printed, typed or visually reproduced material of any kind, whether or not privileged, and includes but is not limited to the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes drawings, graphs, indexes, charts, telephone records, photographs, phonographic records, computer files, other data compilation, or any other written, recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing

items upon which any notation, work, figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge or information.

5. If you file a timely objection to any portion of a request, definition, or an instruction, provide a response to the remaining portion.

6. The terms defined above and the individual data requests should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with applicable law.

7. As used in these requests, the singular shall also be treated as plural and vice-versa.

8. The responses should include the name of the person(s) providing the responses and the witness(es) who will be testifying on behalf of Verizon who will be prepared to answer questions relating to such responses. If, at the time that responses to these requests are due, it has not been determined whether a witness will be testifying on behalf of Verizon who can answer questions relating to the responses, then for each response provide the name of the Verizon representative most knowledgeable regarding the subject area of and information in the response.

9. If any part of a document is responsive to any request, the whole document is to be produced.

10. Any alteration of a responsive document, including any marginal notes, handwritten notes, underlining, date stamped, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document is a separate and distinct document and must be produced.

11. If you are unable to produce a document in response to any request, so state, and indicate whether the document ever existed, or whether the document once existed but cannot be located. If any document once was, but is no longer in your possession, custody or control, state the whereabouts of any such document when last in your possession, custody or control, state the date and manner of its disposition and identify its last know custodian. To the extent any documents are lost or destroyed, produce any documents which support your assertion that the document was lost or destroyed, and provide the date thereof.

12. To the extent you claim any document described herein is privileged, or to the extent that you object to the production of any documents, please identify each and every document to which you claim of privilege or objection to production is asserted by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of each such document, and state in writing the nature and basis for each claim of privilege or objection for each such document.

13. These data requests are continuing in nature and, thus, Verizon is under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

### **DATA REQUESTS**

Conversent 1-1: Please provide a side-by-side comparison of Verizon's current recurring charges for dark fiber loops and dark fiber interoffice transport and Verizon's proposed recurring charges for dark fiber loops and dark fiber interoffice transport in this proceeding.

Conversent 1-2: Please provide a side-by-side comparison of Verizon's current nonrecurring charges for dark fiber loops and dark fiber interoffice transport and Verizon's proposed nonrecurring charges for dark fiber loops and dark fiber interoffice transport in this proceeding.

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Dated: \_\_\_\_\_